



BOULT • CUMMINGS
CONNERS • BERRY PLC

REC'D TN
REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY

November 9, 2001

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Complaint of BellSouth Telecommunications, Inc. Regarding the
Practices of Global Crossing Telecommunications, Inc. in the Reporting of
Percent Interstate Usage for Compensation for Jurisdictional Access
Services
Docket No. 01-00913

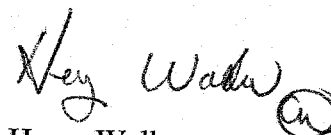
Dear David:

Please accept for filing the original and thirteen copies of the Joint Motion filed
on behalf of Global Crossing Telecommunications, Inc. and BellSouth Telecommunications, Inc.
in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl
Attachment
c: Parties

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

Re: Complaint of BellSouth)	
Telecommunications, Inc. Regarding the)	Docket No. 01-00913
Practices of Global Crossing)	
Telecommunications, Inc. in the Reporting of)	
Percent Interstate Usage for Compensation)	
for Jurisdictional Access Services.)	

**JOINT MOTION TO SET ASIDE PROCEDURAL SCHEDULE AND CONVENE
PRE-HEARING CONFERENCE**

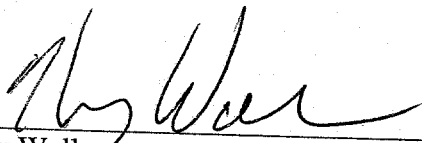
Global Crossing Telecommunications, Inc. and BellSouth Telecommunications, Inc. respectfully request that the Hearing Officer set aside the procedural schedule issued November 8, 2001 and convene a pre-hearing conference for the purpose of arriving at a revised schedule.

As grounds for this motion, the parties submit that this complaint involves matters going back to 1994 and that the discovery necessary to develop a complete evidentiary record will likely require substantially more time than the proposed schedule allows. Global Crossing also anticipates the filing next week of pre-hearing motions which, if granted, could result in the dismissal of the complaint or the suspension of these complaint proceedings pending the outcome of other, related litigation.

While the parties do not wish to delay the expeditious handling of this complaint, they do not believe that it is necessary, prudent or even possible to meet the procedural schedule proposed by the Hearing Officer. The parties therefore ask that the schedule be suspended and that the Hearing Officer convene a pre-hearing conference for the purpose of preparing a revised schedule.

Respectfully submitted,

By:


Henry Walker

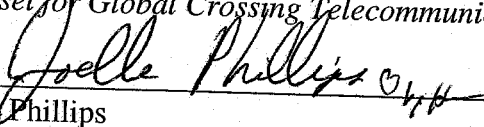
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Counsel for Global Crossing Telecommunications, Inc


Joelle Phillips

BellSouth Telecommunications, Inc.

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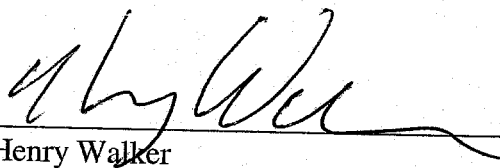
Counsel for BellSouth Telecommunications, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 9th day of November, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

Jonathon Wike, Esq.
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219



Henry Walker